

REMARKS

Summary of the Amendment

Upon entry of the above amendment, claims 8 and 11 will have been canceled and claims 1, 7, 14, 16 and 29 will have been amended. Accordingly, claims 1-7, 9, 10 and 12-30 will be pending with claims 1, 14, 16, and 29 being in independent form.

Summary of the Official Action

In the instant Office Action, the Examiner rejected claims 1-13 and 16-30 over the art of record. Finally, the Examiner indicated that claims 14 and 15 were allowable and would be allowed if presented in independent form. By the present amendment and remarks, Applicant submits that the rejections have been overcome, and respectfully requests reconsideration of the outstanding Office Action and allowance of the present application.

Interview of June 20, 2005

Applicant appreciates the courtesy extended by the Examiner in the Interview of June 20, 2005. Applicant initially notes that the Examiner incorrectly indicated in the Interview Summary that the Interview was via telephone, when, in fact, Applicant's representative met with the Examiner in her office at the USPTO.

In the interview, Applicant's representative proposed amending claims 1, 16 and 29 to recite that the device is a tube whose tip is arranged adjacent to a tip of the glue nozzle

P24819.A03

and that this feature was not disclosed or suggested in the applied art of record.

In response, the Examiner noted that such an amendment would advance prosecution, but noted that Fig. 7 of WO '727 could be interpreted to disclose a substance tube 13 whose tip (the opening adjacent opening 29) was arranged adjacent the glue nozzle tip 29.

In response, Applicant's representative pointed out that the opening adjacent the nozzle tip 29 was not part of the tube 13.

The Examiner responded by indicating that she may properly characterize the opening itself to be a tube but agreed to reconsider our amendment and arguments in response to the Office Action.

The Examiner also did not disagree that the opening was actually part of the nozzle and was not a tube this is separate from the glue nozzle.

Finally, the Examiner noted that the above-noted arguments may be more persuasive with regard to method claim 16.

Status of the Certified Priority Document

The Examiner has neglected to acknowledge Applicant's claim to foreign priority and to indicate on the form PTOL-326 that "All of" of the certified copies of the priority documents have been received.

Applicant notes that the certified copy of the priority document was filed at the time of filing of the instant application of January 30, 2004.

Accordingly, Applicant respectfully requests that the Examiner indicate such

P24819.A03

acknowledgment on form PTOL-326 in the next Office Action.

Traversal of Rejections Under 35 U.S.C. § 102(b)

Over WO 89/04727

Applicant traverses the rejection of claims 1, 2, 4-12, 16, 17, 20-25 and 29 under 35 U.S.C. § 102(b) as being anticipated by WO 89/04727.

The Examiner asserted that this document discloses or suggests all the features recited in these claims including the glue nozzle and the device. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what this document discloses, Applicant submits that this document fails to disclose, or even suggest: inter alia, a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web while the moving web moves along a direction and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle, and wherein the device is separate from the glue nozzle and delivers the substance behind the outlet opening relative to the direction*, as recited in amended independent claim 1; inter alia, a method of applying glue to a moving web utilizing a system that includes a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web, and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue*

P24819.A03

nozzle, the method comprising applying the glue onto the moving web while the moving web moves along a direction and feeding the substance behind the outlet opening relative to the direction, as recited in amended independent claim 16, and inter alia, a glue nozzle comprising a tip having an outlet opening, the glue nozzle being adapted to apply glue through the outlet opening, a feeding device that delivers a substance to a region of the outlet opening, *the feeding device being a tube separate from the glue nozzle and whose tip is arranged adjacent the tip of the glue nozzle*, and a system for feeding the substance to the feeding device, wherein the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor, as recited in amended independent claim 29.

Applicant acknowledges that WO 89/04727 discloses various embodiments of a coating nozzle which utilizes a device for feeding a substance to the coating. Applicant also acknowledges that Fig. 7 appears to show the device delivers the substance behind the outlet opening relative to the direction. However, Applicant submits that WO 89/04727 clearly does not disclose, or even suggest, that the device is a tube whose tip is arranged adjacent the tip of the glue nozzle. It is also clear, from Fig. 7 of WO 89/04727, that the device is not separate from the glue nozzle.

Moreover, as WO 89/04727 appears to be limited to a nozzle for applying a coating, Applicant submits that this document cannot properly be read to disclose or suggest a method of applying glue to a moving web, much less, one which utilizing a system that includes a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web, and a device that delivers a

P24819.A03

substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle.*

Thus, it is clear that WO 89/04727 fails to disclose or even suggest the combination of features recited in at least independent claims 1, 16 and 29.

Applicant further notes that, for an anticipation rejection under 35 U.S.C. § 102 to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Moreover, Applicant submits that dependent claims 2, 4-12, 17 and 20-25 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of WO 89/04727 discloses or suggests, in combination: that the moving web comprises one of a cigarette paper web in strip form and folding box blanks as recited in claim 2; that the system is arranged on one of a continuous cigarette making machine and a cigarette packing machine as recited in claim 3; that the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 4; that the device delivers the substance directly behind the outlet opening relative to the direction as recited in claim 5; that the device is adapted to deliver the substance in the form of spots as recited in claim 6; that the tube is a capillary as recited in claim 7; that the device is arranged at a distance "d" from the glue nozzle as recited in claim 9; that the device is one of arranged directly adjacent to the glue nozzle and arranged to abut the glue nozzle as recited in claim 10; that the system further comprises a system for feeding the substance to the device as recited in

P24819.A03

claim 12; that the system for feeding the substance regulates an amount of the substance which is applied to the moving web as recited in claim 13; that the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 17; that feeding comprises continuously feeding the substance behind the outlet opening relative to the direction as recited in claim 20; that the feeding comprises intermittently feeding the substance behind the outlet opening relative to the direction as recited in claim 21; that the feeding comprises cyclically feeding the substance behind the outlet opening relative to the direction as recited in claim 22; that the method further comprises at least one of regulating the feeding and controlling the feeding as recited in claim 23; that the method further comprises at least one of regulating the feeding on a timely basis and controlling the feeding on a timely basis as recited in claim 24; that the method further comprises at least one of regulating the feeding on a quantity basis and controlling the feeding on a quantity basis as recited in claim 25; that the method further comprises controlling an amount of the substance which is applied to the moving web as recited in claim 26; that the method may further comprise regulating an amount of the substance which is applied to the moving web via a measuring unit as recited in claim 27; and that the method further comprises conveying, after the feeding, the moving web away from the device as recited in claim 28.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

Over Yapel

Applicant traverses the rejection of claims 1, 2, 4, 5, 7, 12, 16, 17, 28 and 29 under 35 U.S.C. § 102(b) as being anticipated by US patent 6,117,237 to YAPEL et al.

The Examiner asserted that this document discloses or suggests all the features recited in these claims including the glue nozzle and the device. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what this document discloses, Applicant submits that this document fails to disclose, or even suggest: inter alia, a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web while the moving web moves along a direction and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle, and wherein the device is separate from the glue nozzle and delivers the substance behind the outlet opening relative to the direction*, as recited in amended independent claim 1; inter alia, a method of applying glue to a moving web utilizing a system that includes a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web, and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle*, the method comprising applying the glue onto the moving web while the moving web moves along a direction and feeding the substance behind the outlet opening relative to the direction, as recited in amended independent claim 16, and inter alia, a glue nozzle

P24819.A03

comprising a tip having an outlet opening, the glue nozzle being adapted to apply glue through the outlet opening, a feeding device that delivers a substance to a region of the outlet opening, *the feeding device being a tube separate from the glue nozzle and whose tip is arranged adjacent the tip of the glue nozzle*, and a system for feeding the substance to the feeding device, wherein the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor, as recited in amended independent claim 29.

Applicant acknowledges that YAPEL discloses various embodiments of a coating device which utilizes a device for feeding a substance to the coating. Applicant also acknowledges that Fig. 1 appears to show a manifold 26 that delivers the substance behind the outlet opening relative to the direction. However, Applicant submits that YAPEL clearly does not disclose, or even suggest, that the device is a tube whose tip is arranged adjacent the tip of the glue nozzle.

Moreover, as YAPEL appears to be limited to a nozzle for applying a coating fluid, Applicant submits that this document cannot properly be read to disclose or suggest a method of applying glue to a moving web, much less, one which utilizing a system that includes a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web, and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle*.

Thus, it is clear that YAPEL fails to disclose or even suggest the combination of features recited in at least independent claims 1, 16 and 29.

P24819.A03

Applicant further notes that, for an anticipation rejection under 35 U.S.C. § 102 to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Moreover, Applicant submits that dependent claims 2, 4, 5, 12, 17 and 28 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of YAPEL discloses or suggests, in combination: that the moving web comprises one of a cigarette paper web in strip form and folding box blanks as recited in claim 2; that the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 4; that the device delivers the substance directly behind the outlet opening relative to the direction as recited in claim 5; that the tube is a capillary as recited in claim 7; that the system further comprises a system for feeding the substance to the device as recited in claim 12; that the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 17; and that the method further comprises conveying, after the feeding, the moving web away from the device as recited in claim 28.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

Over Hess

Applicant traverses the rejection of claims 1, 2, 4, 5, 7, 8 and 12 under 35 U.S.C. §

P24819.A03

102(b) as being anticipated by US patent 6,248,407 to HESS.

The Examiner asserted that this document discloses or suggests all the features recited in these claims including the glue nozzle and the device. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what this document discloses, Applicant submits that this document fails to disclose, or even suggest: inter alia, a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web while the moving web moves along a direction and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle, and wherein the device is separate from the glue nozzle and delivers the substance behind the outlet opening relative to the direction*, as recited in amended independent claim 1.

Applicant acknowledges that HESS discloses various embodiments of a coating device which utilizes a device for feeding a substance to the coating. Applicant also acknowledges that Fig. 1 appears to show a housing 24 that delivers the substance behind the outlet opening relative to the direction. However, Applicant submits that HESS clearly does not disclose, or even suggest, that the device is a tube whose tip is arranged adjacent the tip of the glue nozzle.

Thus, it is clear that HESS fails to disclose or even suggest the combination of features recited in at least independent claim 1.

Applicant further notes that, for an anticipation rejection under 35 U.S.C. § 102 to be proper, each element of the claim in question must be disclosed in a single document, and

P24819.A03

if the document relied upon does not do so, then the rejection must be withdrawn.

Moreover, Applicant submits that the rejection of claim 8 is moot inasmuch as claim 8 has been canceled and that dependent claims 2, 4, 5, 7 and 12 are allowable at least for the reason that these claims depend from an allowable base claim and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of HESS discloses or suggests, in combination: that the moving web comprises one of a cigarette paper web in strip form and folding box blanks as recited in claim 2; that the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 4; that the device delivers the substance directly behind the outlet opening relative to the direction as recited in claim 5; that the tube is a capillary as recited in claim 7; and that the system further comprises a system for feeding the substance to the device as recited in claim 12.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

Traversal of Rejections Under 35 U.S.C. § 103(a)

Over WO 89/04727 alone

Applicant respectfully traverses the rejection of claims 18 and 19 under 35 U.S.C. § 103(a) as unpatentable over WO 89/04727 alone.

The Examiner acknowledged that WO 89/04727 lacks, among other things, the features recited in the above-noted claims such as the recited liquefied glue after the

P24819.A03

glue is applied. However, the Examiner asserted that such features would have been obvious to one of ordinary skill in the art. Applicant respectfully traverses this rejection.

Notwithstanding the Examiner's assertions as to what WO 89/04727 discloses or suggests, Applicant submits that in addition to failing to anticipate the invention recited in amended independent claim 16, WO 89/04727 also fails to teach or suggest the invention recited in at least the independent claim 16.

Applicant directs the Examiner's attention to the guidelines identified in M.P.E.P. section 2141 which state that "[i]n determining the propriety of the Patent Office case for obviousness in the first instance, it is necessary to ascertain whether or not the reference teachings would appear to be sufficient for one of ordinary skill in the relevant art having the reference before him to make the proposed substitution, combination, or other modification." *In re Linter*, 458 F.2d 1013, 1016, 173 USPQ 560, 562 (CCPA 1972).

As this section clearly indicates, "[o]bviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992)."

Moreover, it has been legally established that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) Although a prior art device 'may be capable of being modified to

P24819.A03

run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so.' 916 F.2d at 682, 16 USPQ2d at 1432.). See also *In re Fritch*, 972 F.2d 1260, 23 USPQ2d 1780 (Fed. Cir. 1992) (flexible landscape edging device which is conformable to a ground surface of varying slope not suggested by combination of prior art references)."

Additionally, it has been held that "[a] statement that modifications of the prior art to meet the claimed invention would have been well within the ordinary skill of the art at the time the claimed invention was made' because the references relied upon teach that all aspects of the claimed invention were individually known in the art is not sufficient to establish a prima facie case of obviousness without some objective reason to combine the teachings of the references. *Ex parte Levengood*, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993)."

Moreover, Applicant submits that there is no motivation to modify WO 89/04727 in a manner which would render obvious Applicant's invention, and additionally, Applicant submits that there is no motivation or rationale disclosed or suggested in the prior art to modify the applied reference in the manner suggested by the Examiner. The Examiner's opinion does not provide a proper basis for these features or for the motivation to modify this document in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 1 is not rendered obvious by any reasonable inspection and interpretation of the disclosure of the applied reference.

Furthermore, Applicant submits that dependent claims 18 and 19 are allowable at least for the reason that these claims depend from allowable base claims and because

P24819.A03

these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading or modification of WO 89/04727 discloses or suggests, in combination: that the method further comprises liquefying the glue after the applying as recited in claim 18; and that the method further comprises liquefying the glue after the glue is applied to the moving web, and wherein the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 19.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 103(a).

Over Yapel alone

Applicant respectfully traverses the rejection of claims 13, 18-27 and 30 under 35 U.S.C. § 103(a) as unpatentable over YAPEL alone.

The Examiner acknowledged that YAPEL lacks, among other things, the features recited in the above-noted claims such as the recited regulating of the amount of substance which is applied to the moving web. However, the Examiner asserted that such features would have been obvious to one of ordinary skill in the art. Applicant respectfully traverses this rejection.

Notwithstanding the Examiner's assertions as to what YAPEL discloses or suggests, Applicant submits that in addition to failing to anticipate the invention recited in amended independent claims 1, 16 and 29, YAPEL also fails to teach or suggest the invention recited in at least the independent claims 1, 16 and 29.

Moreover, Applicant submits that there is no motivation to modify YAPEL in a manner which would render obvious Applicant's invention, and additionally, Applicant submits that there is no motivation or rationale disclosed or suggested in the prior art to modify the applied reference in the manner suggested by the Examiner. The Examiner's opinion does not provide a proper basis for these features or for the motivation to modify this document in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claims 1, 16 and 29 are not rendered obvious by any reasonable inspection and interpretation of the disclosure of the applied reference.

Furthermore, Applicant submits that dependent claims 13, 18-27 and 30 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading or modification of YAPEL discloses or suggests, in combination: that the system for feeding the substance regulates an amount of the substance which is applied to the moving web as recited in claim 13; that the method further comprises liquefying the glue after the applying as recited in claim 18; that the method further comprises liquefying the glue after the glue is applied to the moving web, and wherein the substance comprises at least one of a substance adapted to liquefy the glue, a low-viscosity fluid, water, and water vapor as recited in claim 19; that the feeding comprises continuously feeding the substance behind the outlet opening relative to the direction as recited in claim 20; that the feeding comprises intermittently feeding the substance behind the outlet opening relative to the direction as recited in claim 21; that the

P24819.A03

feeding comprises cyclically feeding the substance behind the outlet opening relative to the direction as recited in claim 22; that the method further comprises at least one of regulating the feeding and controlling the feeding as recited in claim 23; that the method further comprises at least one of regulating the feeding on a timely basis and controlling the feeding on a timely basis as recited in claim 24; that the method further comprises at least one of regulating the feeding on a quantity basis and controlling the feeding on a quantity basis as recited in claim 25; that the method further comprises controlling an amount of the substance which is applied to the moving web as recited in claim 26; that the method may further comprise regulating an amount of the substance which is applied to the moving web via a measuring unit as recited in claim 27; and a method of applying glue to a moving web utilizing the system, the method comprising applying the glue onto a moving web while the moving web moves along a direction, feeding the substance behind the outlet opening relative to the direction, and regulating an amount of the substance which is applied to the moving web in the region of the outlet opening as recited in claim 30.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 103(a).

Over WO 89/04727 and Fietkau

Applicant respectfully traverses the rejection of claim 3 under 35 U.S.C. § 103(a) as unpatentable over WO 89/04727 in view of US published patent application 2002/0023655 to FIETKAU.

While acknowledging that WO 89/04727 lacks, among other things, any disclosure

P24819.A03

with regard to the recited apparatus being arranged on a cigarette making machine, the Examiner asserts that FIETKAU teaches such a feature and that it would have been obvious to modify WO 89/04727 in view of FIETKAU. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what these documents disclose or suggest, Applicant submits that no proper combination of WO 89/04727 and FIETKAU discloses or suggests, inter alia, a glue nozzle coupled to glue reservoir, the glue nozzle comprising a tip having an outlet opening arranged to apply glue to the moving web while the moving web moves along a direction and a device that delivers a substance to a region of the outlet opening, *wherein the device is a tube whose tip is arranged adjacent the tip of the glue nozzle, and wherein the device is separate from the glue nozzle and delivers the substance behind the outlet opening relative to the direction*, as recited in amended independent claim 1.

As explained above, WO 89/04727 fails to disclose or suggest that the device is a tube whose tip is arranged adjacent the tip of the glue nozzle. Indeed, it is clear from Fig. 7 of WO 89/04727 that the device is not separate from the glue nozzle.

Nor does Applicant dispute that FIETKAU discloses a glue nozzle having a glue opening 52 and openings that allow for the passage of pressurized air (see Fig. 5 and paragraphs [0045] and [0048]). However, it is apparent from a fair reading of FIETKAU that this document lacks any disclosure or suggestion with regard to the device being a tube whose tip is arranged adjacent the tip of the glue nozzle. Indeed, it is clear from Fig. 5 of FIETKAU that the device is not separate from the glue nozzle.

Thus, Applicant submits that the above-noted documents fail to disclose or suggest the features recited in at least amended independent claim 1. Because both applied documents fail to disclose or suggest at least the above-noted features of the instant invention, Applicant submits that no proper combination or modification of these documents can render unpatentable the combination of features recited in at least independent claim 1.

Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify WO 89/04727 in view of FIETKAU in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify these documents, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 1 is not rendered obvious by any reasonable inspection of these disclosures.

Furthermore, Applicant submits that dependent claim 3 is allowable at least for the reason that these claims depend from an allowable base claim and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of WO 89/04727 and FIETKAU discloses or suggests, in combination: that the system is arranged on one of a continuous cigarette making machine and a cigarette packing machine as recited in claim 3.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that these claims are allowable over the applied art of record.

Acknowledgment of Allowable Subject Matter

Applicant acknowledges and appreciates the Examiner's indication that claims 14 and 15 contain allowable subject matter and would be allowable if presented in independent form. Accordingly, as Applicant has presented claim 14 in independent form, Applicant respectfully request that at least claims 14 and 15 be indicated as being allowed.

CONCLUSION

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the Applicant's invention, as recited in each of the pending claims. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

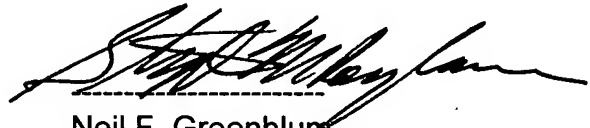
Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and now believed to be appropriate.

The Commissioner is hereby authorized to refund excess payments and charge any additional fee necessary to have this paper entered to Deposit Account No. 19-0089.

P24819.A03

Should there be any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
D. JANZ et al.

A handwritten signature in black ink, appearing to read "Neil F. Greenblum", written over a horizontal dashed line.

Neil F. Greenblum
Reg. No. 28,394

August 5, 2005
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
703-716-1191

Stephen M. Roylance
Reg. No. 31,296